



DANIEL BOGDEN
United States Attorney

DANIEL R. SCHIESS
Assistant United States Attorney
333 Las Vegas Blvd. South, Suite 5000
Las Vegas, Nevada 89101
(702) 388-6336

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

United States of America,

Plaintiff,

v.

Kimberly Baxa,

Defendant.

Criminal Information

2:13-CR-0179-LRH-PAL

VIOLATIONS: 18 U.S.C. § 1832(a)(2) and 2
(Theft of Trade Secrets)

The United States Attorney charges:

COUNT ONE
Theft of Trade Secrets

From in or about June 2010 to in or about March 2011, in the State and Federal District
of Nevada and elsewhere,

KIMBERLY BAXA,

defendant herein, with intent to convert a trade secret, that is related to and included in a product
that is produced for and placed in interstate commerce, to the economic benefit of anyone other
than the owner of the trade secret, Selling Source, LLC (and its subsidiaries and affiliates), and
intending and knowing that the offense will injure any owner of that trade secret, did knowingly
and without authorization copy, duplicate, upload, download, replicate, transmit, deliver, send,

1 communicate and convey such information, and did attempt to do so, in violation of 18 U.S.C.
2 §§ 1832(a)(2), and 2.

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4 DANIEL G. BOGDEN
United States Attorney

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7 DANIEL R. SCHIESS
Assistant United States Attorney
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